



MOREA SCHWARTZ BRADHAM FRIEDMAN & BROWN <sup>LLP</sup>

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June 28, 2021

**VIA ECF**

Honorable Joanna Seybert  
United States District Court  
Eastern District of New York  
100 Federal Plaza, Courtroom 1030  
Central Islip, New York 11722

**Re: *In re Hain Celestial Heavy Metals Baby Food Litigation***  
**Case No.: 2:21-cv-00678-JS-AYS**

Dear Judge Seybert:

The undersigned write on behalf of Consolidated Plaintiff Nikeita Boulware (“Boulware”) to express support for the *Mays* Plaintiffs’ Group as interim lead counsel, liaison counsel, and executive committee in this matter (ECF No. 66). After reviewing the filings, and comparing the relative experience outlined in the filings, Boulware believes that the *Mays* Group is the best qualified to lead the case and protect her interests.

Given the *Mays* Group’s experience in consumer class actions, food litigation and specifically baby food litigation in this District, they stand out as the most qualified, among a talented field of applicants, to lead the case to successful resolution and protect the interests of the classes, including that of Boulware. *See Hasemann v. Gerber Products Co.*, 331 F.R.D. 239 (E.D.N.Y. 2019)(certifying classes of purchasers of baby food products). In addition, it is evident that the *Mays* Group has done substantial work on the case to date from their filings and has pursued the case with diligence and a high level of skill consistent with the factors outlined in Fed. R. Civ. P. 23. Therefore, the undersigned request that the Court grant the Motion of the *Mays*’ Plaintiffs and adopt their leadership structure in full.

Sincerely,

**Morea Schwartz Bradham  
Friedman & Brown LLP**

**Anastopoulo Law Firm, LLC**

/s/ Peter B. Katzman

Peter B. Katzman  
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*\*Pro Hac Vice Forthcoming*